

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

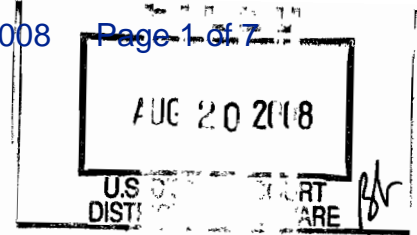
Michael L. Jones

Plaintiff

v

Raynard Jones and Audrey Evans  
defendants

Individually and in their official capacity.

Motion for APPOINTMENT  
OF COUNSELCivil Action NO.  
07-791-GMS  
Jury trial Demanded

Pursuant to 28 U.S.C. § 1915(e)(1) plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel. He has been approved to leave to proceed in forma pauperis.
2. Plaintiff, imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant research and investigation. Plaintiff has no physical access to the law library and limited knowledge of the law. Plaintiff only access to the law library is through mail correspondence only which takes weeks and there are only 2 paralegals for 200 inmates so all requests are not approved or sometimes they don't even understand what you're looking for so it would be almost impossible for plaintiff to meet the required time limits for filing the proper paperwork in this case.
3. A trial in this case will involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross-examine witnesses.
4. Plaintiff will have a hard time trying to get the Jail/Defendants/Lawyers to produce ~~document~~ documents that the plaintiff needs in a timely fashion or at all.

5. Plaintiff has made repeated efforts to obtain a lawyer attached to this motion are some letters I received back from some lawyers I wrote. But without money they will not represent plaintiff.

WHEREFORE, plaintiff request that the court appoint a member of the Delaware state Bar as counsel in this case.

Respectfully Submitted,

Michael L.  417267

JTVCC

1181 Paddock Road

Smyrna Delaware

19977

Dated 8-15-08

LAW OFFICES OF  
**BARROS, McNAMARA, MALKIEWICZ & TAYLOR, P.A.**  
2 WEST LOOCKERMAN STREET  
P.O. BOX 1298  
DOVER, DELAWARE 19903  
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306 E. Stein Highway  
Seaford, DE 19973  
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A. RICHARD BARROS  
EDWARD R. MCNAMARA  
MICHAEL J. MALKIEWICZ  
ROBERT J. TAYLOR  
J. JAY LAZZERI  
BRADLEY S. EABY  
DAVID J. BEVER

**Please respond/fax to our Dover office only**

August 28, 2007

I/M Michael L. Jones  
S.B.I. #417267  
Delaware Correctional Center  
SHV-Bldg. 17-D-Upper 8  
1181 Paddock Road  
Smyrna, DE 19947

**LEGAL  
CORRESPONDENCE**

Mr. Jones:

My law firm will not represent you in the District Court case that you wrote to us about in a letter dated August 16, 2007. We wish you success in your case.

Sincerely,

BARROS, McNAMARA, MALKIEWICZ  
& TAYLOR, P.A.



MICHAEL J. MALKIEWICZ, ESQUIRE

MJM/sep  
P:\SEP\jones.lt.dcc.wpd

**David D. Finocchiaro, L.L.C.**  
**Attorneys at Law**

**David D. Finocchiaro, Esquire**  
**421 Smyrna Clayton Blvd.**  
**Smyrna, Delaware 19977**

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Telephone: (302) 653-5091  
FAX: (302) 653-5093

August 27, 2007

I/M Michael Jones  
SBI # 417267  
Delaware Correctional Center  
SHU Building 17 D Upper 8  
1181 Paddock Road  
Smyrna, DE 19977

Dear Mr. Jones:

Thank you for your letter of August 16, 2007 seeking representation. Unfortunately, I am unable to take this case at this time. I do wish you the best of luck with your case.

Thank you.

Very truly yours,



David D. Finocchiaro

DDF/blb

PENNSYLVANIA INSTITUTIONAL LAW PROJECT

THE CAST IRON BUILDING  
718 ARCH STREET, SUITE 304 SOUTH  
PHILADELPHIA, PENNSYLVANIA 19106

ANGUS R. LOVE  
EXECUTIVE DIRECTOR

PHONE: (215) 925-2966  
FAX: (215) 925-5337


July 12, 2007

Michael Jones  
417267  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

Dear Mr. Jones:

I am in receipt of your recent letter. I regret to inform you that our Projects funding guidelines prohibit us from handling cases outside the state of Pennsylvania; therefore, we are unable to assist you in this matter. Good luck.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Henninger", with a stylized flourish at the end.

Katie Henninger  
Legal Assistant

### CERTIFICATE OF SERVICE

I, Michael J. Jones, hereby certify  
that I have served a true and correct copy of the attached motion upon the  
following party, on the 16<sup>th</sup> day of August, 2008.

1. Office of the Clerk  
844 N. KING ST Lockbox 18  
Wilm Del 19801

2. Attorney General Office  
320 N. French St  
Wilm Del 19801

3. \_\_\_\_\_  
\_\_\_\_\_  
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6. \_\_\_\_\_  
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\_\_\_\_\_  
Date signed

\_\_\_\_\_  
Signature of Movant  
(Notarization not required)

I/M Michael Jones  
SBI# 417267 UNIT —  
JAMES T. VAUGHN CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

Office of the Clerk  
United States District Court  
844 N. Kline Street, Lock Box 18  
Wilmington, Delaware  
19801

LEGAL MAIL



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